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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
REVIEW AND COMMENTS ON DRAFT FINAL SAMPLING AND ANALYSIS PLAN INJECTION
OF EMULSIFIED OIL SUBSTRATES (EOS AND AQUABUPH) FOR IN-SITU
BIOREMEDIATION AT OPERABLE UNIT (OU) 2 NTC ORLANDO FL

4/5/2011

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

April 5, 2011

BRAC PMO SE
Attn: Mr. Art Sanford
4130 Faber Place Drive
Suite 202
North Charleston, SC 29405

RE: Draft Final Sampling and Analysis Plan, Injection of Emulsified Oil Substrates (EOS® and AquaBupH™) for In-Situ Bioremediation at Operable Unit 2 (OU-2), Former Naval Training Center Orlando, Orlando, Florida.

Dear Mr. Sanford:

I have completed my review of the Draft Final Sampling and Analysis Plan, Injection of Emulsified Oil Substrates (EOS® and AquaBupH™) for In-Situ Bioremediation at Operable Unit 2 (OU-2), Former Naval Training Center Orlando, dated January 2011 (received January 26, 2011), prepared and submitted by Solutions-IES, Inc. I have the following comments on the Draft Final Sampling and Analysis Plan:

- (1) SAP Worksheet #2, where the regulatory program is to be specified, it incorrectly identifies Florida's Petroleum Cleanup Rule, Chapter 62-770, Florida Administrative Code (F.A.C.).
- (2) SAP Worksheet #10, page 22, third paragraph, please add benzene to the list of contaminants of concern for the northern plume area. Also, on the same page, near the bottom of the page, it describes some of the conclusions of the Phase I Pilot Study as being different sustainable injection flow rates in Area 1 and Area 2. Please define what Area 1 and Area 2 define.
- (3) SAP Worksheet #14, page 32, in the section on **Monitoring and Injection Well Installation and Development**, it incorrectly identifies OU-2 as being in the St. Johns River Water Management District. It should be the South Florida Water Management District. On that same page near the bottom, please change "navy" to "Navy".

Mr. Art Sanford

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- (4) SAP Worksheet #14, page 34, in the section on **Surface Water Sampling**, end of section, it says that surface water samples are to be analyzed for TCE, cis-1,2-DCE, VC and TOC. Because the detection of a discharge of the injectate into the ditch is the main reason for collecting surface water samples, surface water should be analyzed for Oils and Grease and should meet the surface water criteria specified in Chapter 62-302, F.A.C. I do not see the point of analyzing surface water for TOC.
- (5) Please identify the proper labeling of drums in the **IDW Management** section of SAP Worksheet #14, page 34.
- (6) Please add a table to Worksheet #15 that specifies the reference limits for the chemicals that surface water samples are to be analyzed for. Please also add benzene to the list of groundwater VOC analytes.

If you have any questions regarding this letter, please contact me at (850) 245-8997.

Sincerely,



David P. Grabka, P.G.
Remedial Project Manager
Federal Programs Section
Bureau of Waste Cleanup

Cc: Teresa Grayson, Tetra Tech NUS, Oak Ridge, TN
Jessica Keener, Solutions-IES, Raleigh, NC

JJC  ESN 